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March 10, 2021

VIA ECF

Honorable John P. Cronan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Quizet Rivera et al v. Grill on 2nd Ave LLC et al;
Case No. 15-cv-06293-JPC-KNF

Your Honor:

This firm represents Plaintiffs in the above referenced matter. We write to respectfully request an extension of time to serve the default motion papers due today, per Your Honor's order (Dkt. No. 115) in this matter. This is the first request of this kind.

The reason for the request is that Plaintiffs' counsel has been unable to obtain the last known residential addresses of Defendants Patrick Lane and Patrick M. Brady. In addition, the investigative services that we employed have been unable to locate Defendants due to their very common names. Moreover, Plaintiffs do not have enough information on the Defendants, such as their telephone numbers, to help the investigation.

However, Plaintiffs mailed copies of the Motion for Default Judgement papers to Defendant Garrett P. Doyle and filed the certificate of service reflecting this.

Plaintiffs respectfully request a thirty (30) day extension to serve the default motion papers on the remaining Defendants Patrick Lane and Patrick M. Brady.

We thank the Court for its time and attention in this matter.

Respectfully Submitted,

/s/Catalina Sojo
Catalina Sojo, Esq.

This request is granted. Plaintiffs shall file proof of service in accordance with Local Civil Rule 55.2(c) by April 9, 2021.

SO ORDERED.

Date: March 10, 2021
New York, New York



JOHN P. CRONAN
United States District Judge